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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of the Part 69)
Allocation of General Support)
Facility Costs)

CC Docket No. 92-222

REPLY COMMENTS OF THE NATIONAL RURAL TELECOM ASSOCIATION

The National Rural Telecom Association (NRTA), by its attorney, submits these comments for the limited purpose of opposing suggestions for recovering the General Support Facilities (GSF) costs proposed to be transferred to Common Line in this phase of this proceeding through an increase in the Subscriber Line Charge (SLC). NRTA is an association of commercial local exchange companies that borrow under Rural Electrification Administration and Rural Telephone Bank Telephone loan programs.

NRTA is not objecting to the proposed reassignment of GSF costs. What NRTA opposes is suggestions, such as that of GTE (pp. 5-6), that the SLC be raised for this purpose. This proceeding involves only an isolated fragment of the access compensation issues various regulators and telecommunications industry representatives have raised in recent months. Shifting GSF costs to Common Line has already been determined to be

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necessary. However, it is particularly inappropriate to ask the Commission to force customers that may make no interexchange calls at all to shoulder additional cost burdens for cost recovery changes made to benefit Competitive Access Providers and the very large businesses and carriers they serve. The politically sensitive question of whether to recover more interstate costs through a higher SLC should, at least, be considered in a broader context where benefits for the general public -- not just burdens -- are proposed.

Accordingly, NRTA urges the Commission to reject proposals to raise the SLC at this time and for this purpose.

Respectfully submitted,

NATIONAL RURAL TELECOM ASSOCIATION

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December 21, 1992

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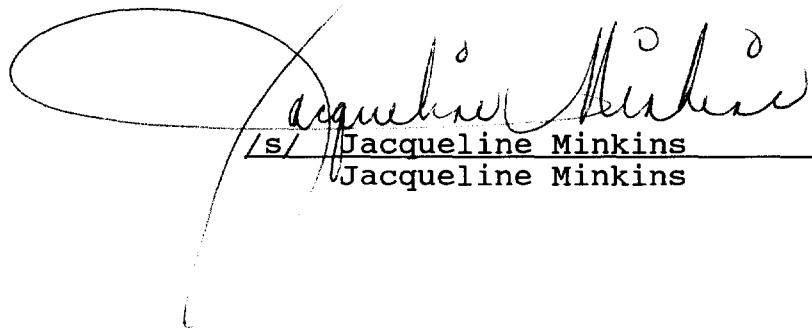
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